

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

DETRA FITTS,)	
)	
Plaintiff,)	
)	
v.)	Cause No. 1:21-CV-695
)	
STAR LEASING COMPANY, LLC,)	
)	
Defendant.)	

COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiff, Detra Fitts (“Fitts”), by counsel, bring this action against Defendant, Star Leasing Company, LLC (“Defendant”), and shows as follows:

OVERVIEW

Fitts bring this action brought under Title VII of the Civil Rights Act of 1964 (hereinafter “Title VII”), 42 U.S.C. §2000e, et. seq., as amended and the Civil Rights Act of 1866 (“Section 1981”). Plaintiff contends she was discriminated because of her race, African American, in violation of Title VII and Section 1981.

PARTIES

1. Fitts resided in the Southern District of Indiana at all times relevant to this action. She was employed by Defendant and was an employee as defined by 42 U.S.C. §2000e(f).
2. At all relevant times Defendant was continuously doing business in the southern district of Indiana and is an employer as defined by 42 U.S.C. §2000e(b).

JURISDICTION AND VENUE

3. This Court has jurisdiction over Defendant pursuant to 28 U.S.C. §1331, 42

and U.S.C. §2000e-5(f)(3).

4. Plaintiff satisfied her obligation to exhaust her administrative remedies by timely filing a charge with the U.S. Equal Employment Opportunity Commission (hereinafter “EEOC”), receiving the appropriate *Dismissal and Notice of Suit Rights*, and timely filing this Complaint within ninety (90) days thereof.

5. As all events pertinent to this lawsuit occurred within the Southern District of Indiana, venue in this Court is proper.

FACTS

6. Defendant hired Fitts, an African-American woman, on or about April 8, 2008. She was the Marketing Manager and Sales Force Administrator.

7. At all times Fitts met or exceeded Defendant’s legitimate expectations of performance.

8. On April 15, 2019, Defendant hired Lisa Ricci, a Caucasian female. Ricci became Fitts’ new boss.

9. Thereafter, Ricci levied false performance claims against Fitts. On or about July 9, 2019, Ricci let Fitts go.

10. Thereafter, a non-African American employee was hired to replace Fitts.

11. Ricci engaged in acts after Fitts was separated that were attributed to Fitts and caused her to suffer further harm and damage to her reputation.

12. Fitts was harmed by Defendant’s unlawful conduct.

LEGAL CLAIMS

COUNT I: RACE DISCRIMINATION

13. Fitts hereby incorporates by reference paragraphs one (1) through twelve (12) of this Complaint.

14. Fitts was treated differently in the terms and conditions of her employment than non-African American employees.

15. Upon information and belief Defendant acted with intent, malice, and/or reckless disregard as to rights afforded to Fitts under Title VII and Section 1981.

16. Fitts suffered harm as a result of Defendant's unlawful conduct.

REQUESTED RELIEF

WHEREFORE, Plaintiff, Detra Fitts, respectfully requests the following:

- a) An Order finding Defendant liable for back wages in an amount to make Plaintiff whole;
- b) An Order finding Defendant liable for compensatory damages in an amount to make Plaintiff whole;
- c) An Order awarding Plaintiff punitive damages as a penalty for Defendant's intentional, unlawful conduct;
- d) An Order awarding Plaintiff the costs of this action;
- e) An Order awarding Plaintiff her attorneys' fees;
- f) An Order awarding Plaintiff pre- and post-judgment interest at the highest rates allowed by law; and
- g) An Order granting such other and further relief as may be necessary and appropriate.

Respectfully submitted,

s/ Christopher S. Wolcott
Christopher S. Wolcott (#23259-32)
The Wolcott Law Firm LLC

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Attorney for Plaintiff

JURY TRIAL DEMAND

Plaintiff demands a trial by jury on all issues deemed triable.

Respectfully submitted,

s/ Christopher S. Wolcott
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